

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

STEVEN HOTZE, M.D.; WENDELL  
CHAMPION; HON. STEVE TOTH; and  
SHARON HEMPHILL,

*Plaintiffs,*

v.

CHRIS HOLLINS, in his official capacity as Harris  
County Clerk,

*Defendants,*

and

MJ FOR TEXAS; DSCC; DCCC; MARY  
CURRIE; CARLTON CURRIE; JEKAYA  
SIMMONS; AND DANIEL COLEMAN,

*Proposed Intervenor-  
Defendants*

Civil Action No. 4:20-cv-03709

**DECLARATION OF JOHN DEVANEY IN SUPPORT OF PROPOSED  
INTERVENOR- DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

I, John Devaney, declare as follows:

1. My name is John Devaney. I am over 18 years of age and am competent to make this declaration. I am a partner with the law firm of Perkins Coie LLP, where I have previously served as Firmwide Managing Partner and as the Managing Partner of the firm's Washington, D.C. office. I am admitted to practice in the District of Columbia, the U.S. District Court for the District of Colorado, and the U.S. Court of Appeals for the District of Columbia Circuit, the Federal Circuit, and the Sixth, Eighth, Ninth, and Tenth Circuits. My application for *pro hac vice* admission in this matter is pending. I submit this declaration in support of Proposed Intervenor's

Opposition to Plaintiffs' Motion for a Preliminary Injunction.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the affidavit of Beth Stevens, senior adviser on voting rights and access for the Harris County Clerk's Office, which was submitted in support of Chris Hollins' Response to Petitions for Writ of Mandamus in Texas Supreme Court Case Nos. 20-0815 and 20-0819.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Harris County's early voting totals as of October 30, which I obtained from the following URL located on the Harris County elections website: [https://harrisvotes.com/Docs/Uploads/EVPA\\_unofficial.pdf](https://harrisvotes.com/Docs/Uploads/EVPA_unofficial.pdf)

4. Attached hereto as **Exhibit 3** is a true and correct copy of the mandamus petition filed in the Texas Supreme Court in Case No. 20-0819 by some of the plaintiffs in this lawsuit.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a new mandamus petition filed in the Texas Supreme Court in Case No. 20-0863 by Plaintiffs.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Declaration of Mary Currie.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Declaration of Carlton Currie Jr.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Declaration of JeKaya Simmons.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the Declaration of Daniel Coleman.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the Declaration of Laura Hines-Pierce.

Dated this 31st day of October, 2020.

Respectfully submitted,

/s/ John S. Devaney  
John Devaney